COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHCENTRAL REGION - FIELD OPERATIONS
AIR QUALITY PROGRAM

PLAN APPROVAL

Approval No: 06-05069B

Source & Air Cleaning Device: Lead/Acid Battery Assembly

Owner: East Penn Mfg. Co., Inc.

Various Controls

Address: PO Box 147

Lyon Station, PA 19536

Attention: Mr. Troy Greiss

Environmental Health & Safety

Location: Battery Assembly Plants

Richmond Township, Berks County

In accordance with provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and with Chapter 127 of the rules and regulations of the Department of Environmental Protection, the Department on SEP 2 8 2005 approved plans for the actions as listed in the Condition 3 below.

This PLAN APPROVAL expires December 31, 2006.

The plan approved is subject to the following conditions:

1. The facility is to be modified in accordance with the plans submitted with the application (as herein approved).

2. See attached.

Notify the person noted below when the installation is completed so that the source can be inspected for issuance of an OPERATING PERMIT.

NOTE: Roger A Fitterling
Air Quality Program
1005 Cross Roads Boulevard
Reading, PA 19605
610-916-0100

Program Manager

Southcentral Region 06-05069B
Reading District
Permits

Conditions (continued):

3. This approval is issued for the following actions:

133 a. The construction of two single grid casters in Assembly Plant A-2, controlled by an existing fabric collector (Scientific or equivalent) and a secondary filter (HEPA or equivalent).

133 b. The modification of one single grid caster in Assembly Plant A-2, controlled by an existing fabric collector (Scientific or equivalent) and a secondary filter (HEPA or equivalent).

139 c. Installation of mist eliminator (Viron or equivalent) to control emissions from the Assembly Plant A-2 formation operation.

131 & 136 d. Construction of three pasting lines and two oxide storage silos in Assembly Plant A-2, controlled by an existing Rotoclone scrubber (AAF or equivalent), an existing fabric collector (Scientific or equivalent) and secondary filter (HEPA or equivalent); or two bin vents (Dynamic or equivalent), an existing fabric collector (Farr or equivalent) and a secondary filter (HEPA or equivalent).

182 e. Construction of a continuous grid caster and two lead pots in Assembly Plant S-1, controlled by an existing rotoclone scrubber (AAF or equivalent) and a secondary filter (HEPA or equivalent).

133A & 156A f. Modification of seven existing continuous casters in Assembly Plants A-2 and A-3.

136 g. Modification of four existing oxide silos in Assembly Plant A-2, controlled by bin vents (Dynamic or equivalent), an existing fabric collector (Farr or equivalent) and a secondary filter (HEPA or equivalent).

4. The permittee shall limit the emissions as follows:

a. Single Grid Casters

1. Particulate – 0.001 grains per dry standard cubic foot (Method 5)
2. Lead – 0.0001 grains per dry standard cubic foot (Method 12)
3. Opacity – 0 percent (Method 9)
4. Lead – 0.02 ton during any consecutive 12-month period (Method 12)

b. Formation

1. Sulfuric Acid – 0.001 grains per dry standard cubic foot (Method 8)
2. Opacity – 0 percent (Method 9)

c. Pasting (wet side)

1. Particulate – 0.003 grains per dry standard cubic foot (Method 5)
2. Lead – 0.00044 grains per dry standard cubic foot (Method 12)
3. Opacity – 0 percent (Method 9)
4. Lead – 0.20 ton during any consecutive 12-month period (Method 12)

Conditions (continued):

d. Pasting (dry side)

1. Particulate – 0.001 grains per dry standard cubic foot (Method 5)
2. Lead – 0.0001 grains per dry standard cubic foot (Method 12)
3. Opacity – 0 percent (Method 9)
4. Lead – 0.07 ton during any consecutive 12-month period (Method)

e. Lead Oxide Silos

1. Particulate – 0.001 grains per dry standard cubic foot (Method 5)
2. Lead – 0.0001 grains per dry standard cubic foot (Method 12)
3. Opacity – 0 percent (Method 9)

f. Continuous Grid Casters (Lead Pots)

1. Particulate – 0.003 grains per dry standard cubic foot (Method 5)
2. Lead – 0.000176 grains per dry standard cubic foot (Method 12)
3. Opacity – 0 percent (Method 9)

g. Continuous Grid Caster (Caster)

1. VOC – 0.02 grains per dry standard cubic foot (Alcoa Methods)
2. Opacity – 0 percent (Method 9)

h. Existing Continuous Grid Casters (Caster only)

1. VOC – 0.02 grains per dry standard cubic foot (Alcoa Methods)

5. The permittee shall operate the sources with no malodors as defined by the Department under Section 123.31.

6. The permittee shall operate the various combustion sources with good air pollution practices.

7. Equipment (a differential manometer or equivalent, as approved by the Department), shall be provided and maintained so that at any time the pressure drop across the various control devices can be measured. This does not include the bin vents.

8. The various sources, except the formation operations and the caster part of the continuous grid casters, are subject to Subpart KK of the Standards of Performance for New Stationary Souces and shall comply with all applicable requirements of this Subpart. 40 CFR Section 60.4 requires submission of copies of all requests, reports, applications, submittals and other communications to both EPA and the Department. The EPA copies shall be forwarded to:

Director
Air Protection Division
US EPA Region III
1650 Arch Street
Philadelphia, Pa 19103-202

Conditions (continued):

9. The permittee shall limit the emissions of NOx and VOC from the various sources making up the Assembly Facility to the following:

   a. NOx – 80.1 tons during any consecutive 12-month period
   b. VOC – 47.6 tons during any consecutive 12-month period

10. The permittee shall limit the emissions of VOC from all continuous grid casting machines to a facility total of 9.01 tons during any consecutive 12-month period.

11. Within 60 days after achieving the maximum production rate at which the affected sources will be operated, but not later than 180 days after the initial start-up of each source, the permittee shall conduct performance tests as per Section 60.8 and 60.372 of 40 CFR Part 60, Subpart KK and Chapter 139 of the rules and regulations of the Department. This testing does not apply to the formation operations. The permittee may request a delay in the testing, if the additional modifications are to be made to the source or control device within a time frame acceptable to the Department.

12. The permittee shall limit the fuel consumption by the Assembly Facility to 1.09×10^{12} BTUs during any consecutive 12-month period.

13. Prior to issuance of an operating permit, and no longer than 180 days after the start-up of each source, the permittee must perform a stack test on the sources covered by this approval in accordance with the provisions of Chapter 139 to show compliance. The stack test shall be preformed while the aforementioned sources are operating at the maximum rated capacity as stated on the application. The stack test shall be for:

    a. VOC from the new continuous caster (caster stack only) including both gaseous and condensate).
    b. Particulate from the Pasting (wet side) Rotoclone (Assembly Plant A-2).
    c. Opacity from the formation scrubber and each concaster.

14. The permittee shall use the following test methods for the associated pollutant:

    a. Sulfuric Acid Mist – EPA Method 8 from 40 CFR Part 60
    b. VOC (concaster wheel) – Alcoa Field Test Method 1470-94/ Alcoa Laboratory Analysis Method 1471-94

15. At least 60 days prior to the test, the permittee shall submit to the Department for approval, the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

16. At least 30 days prior to the test, the Regional Air Quality Program Manager or his representative shall be informed of the date and time of the test.

17. Within 30 days after the source tests, three copies of the complete test report, including al operating conditions, shall be submitted to the Regional Air Quality Program Manager or his representative for approval.

Conditions (continued):

18. If during the lead testing (NSPS) of a control device handling sources with difference standards, the emissions exceed the lowest standard, then the permittee shall determine the air volumes from each effected source. An equivalent standard shall be determined based on the equation in 40 CFR Part 60, Subpart KK.

19. The permittee shall conduct an inspection of the sources and control devices as follows:

    a. Weekly record the pressure drop across each control device including HEPA filters
    b. Weekly check for visible emissions from each source
    c. Weekly check for malodors from each source
    d. Quarterly check the collectors for:

        1. Wear and damage
        2. Removal of collected material
        3. Fugitive emissions
        4. Cleaning cycles

20. The permittee shall record the results of the inspection in a manner approved by the Department.

21. This Plan Approval authorizes temporary operation of the sources covered by this Plan Approval provided the following conditions are met:

    a. The Department must receive written notice from the permittee of the completion of construction, modification and/or installation and the permittee's intent to commence operation at least five working days prior to the completion of the work. The notice shall state when the work will be completed and when the permittee expects to commence operation.

    b. Operation is authorized only to facilitate the start-up and shakedown of sources and air cleaning devices, to permit operations pending the issuance of an Operating Permit or to permit the evaluation of the sources for compliance with all applicable regulations and requirements.

    c. This condition authorizes temporary operation of the sources for a period of 180 days from the date of commencement of operation, provided the Department receives notice from the permittee pursuant to Subpart (a), above.

    d. The permittee may request an extension if compliance with all applicable regulations and Plan Approval requirements has not been established. The extension request shall be submitted in writing at least 15 days prior to the end of this period of temporary operation and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance and the reasons compliance has not been established.

Conditions (continued):

e. The notice submitted by the permittee pursuant to Subpart (a), above, prior to the expiration of this Plan Approval, shall modify the Plan Approval expiration date. The new Plan Approval expiration date shall be 180 days from the date of commencement of operation.

21. The permittee shall notify the person noted on the Plan Approval when the source is operating as designed so that the source can be inspected while in operation for the issuance of an Operating Permit.

22. Records required under this approval and 40 CFR Part 60, Subpart KK, shall be kept for a period of five years and shall be available to the Department upon request.